

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

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NOTICE OF LODGING DOCUMENTS UNDER SEAL
TO THE COURT AND ITS ATTORNEYS OF RECORD:

Plaintiffs hereby give notice that they are provisionally lodging an unredacted version of Plaintiffs' Response in Opposition to Steven Finney's Motion to Quash Subpoenas and For Protective Order ("Plaintiffs' Opposition") as well as Exhibits 1, 2, and 20 to the Declaration of Vanessa Baehr-Jones in support thereof under seal. Exhibit 1 is the final transcript in the deposition of Eric Daigle, taken on June 10, 2024. Exhibit 2 is the redacted transcript in the deposition of Cathy Ball, taken on June 3, 2024. Exhibit 20 is a redacted copy of the JCPD case notes in Female 3's case. Sealed filing is appropriate for the reasons set forth in the Declaration of Vanessa Baehr-Jones, namely, counsel for Defendants have indicated that they need additional time to review the deposition transcripts as the deadline for designating transcripts under the parties' Protective Order (ECF 94) has not yet run. Additionally, counsel for Defendant Johnson City has not agreed to de-designate any Johnson City Police Department reports relating to open criminal investigations into Sean Williams. As the unredacted version of Plaintiffs' Opposition contains information from Exhibits 1, 2, and 20, it must also be lodged under seal provisionally.

Plaintiffs therefore request the Court set a briefing schedule for any motions to seal which Defendants intend to bring, and in the interim, provisionally seal the unredacted version of Plaintiffs' Response as well as Exhibits 1, 2, and 20, which are filed in support of Plaintiffs' Opposition to Steven Finney's Motion to Quash (ECF 202).

Dated: June 14, 2024

Respectfully submitted,

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

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Pro Hac Vice

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 14, 2024 to counsel of record:

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/s/ Elizabeth A. Kramer
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